



Submitted via email: District40@council.nyc.gov

July 14, 2022

The Honorable Rita Joseph
Committee of Education
New York City Council
250 Broadway
New York, NY 10007

RE: School Hearing Screening

Dear Chair Joseph and Members of the Committee:

On behalf of the American Speech-Language-Hearing Association, I write to request that you introduce legislation to require the Department of Education to reinstate school hearing screenings in New York City schools.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, and swallowing disorders. Over 19,100 ASHA members reside in New York, many of whom live and work in New York City.¹

In 2009, New York City Chancellor's Regulation A-701 discontinued routine hearing screening of students in kindergarten and first grade effective for the 2009-2010 school year. As recommended by the New York City Department of Health and Mental Hygiene and accepted by the Department of Education, the cancellation of this critical program is based on the statement in Regulation A-701's summary of changes that the "U.S. Preventative Services Task Force (USPSTF) does not recommend hearing screening in school-age children."² However, this reference is from an outdated 1996 report that appears to rely on 15-year-old recommendations from the Canadian Task Force on the Periodic Health Examinations.^{3,4}

Given the increase in the number of school-age children with hearing loss, ASHA disagrees with discontinuing routine hearing screening for these students. Although demographic data are difficult to interpret, recent figures suggest that the prevalence of hearing loss in school-age children is between 11.3% and 14.9%.⁵ Using these statistics, an average of 131 of every 1,000 school-age children have some degree of hearing loss that can potentially affect communication, learning, psychosocial development, and academic achievement.

Hearing screening for school-age children is strongly supported by several of the nation's leading children's health and hearing experts. They include the Centers for Disease Control and Prevention (CDC), Health Resources and Services Administration (HRSA), American Academy of Pediatrics (AAP), ASHA, Education Audiology Association (EAA), and National Institute for Deafness and Other Communication Disorders (NIDCD).

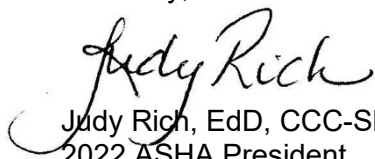
Thousands of school-age children are now at a serious health risk because of the decision made by the NYC Department of Education. In addition, New Yorkers could face years of bearing unnecessary health, educational, and social costs. Approximately 2.5 million school-age

children in the United States (5.4% or about 1 in 20) have mild or unilateral hearing loss, more than one-third of whom are projected to fail at least one grade and/or will require additional educational support.⁶ These are the children that school hearing screening programs identify. Based on the incidence level data, it is estimated that nearly 54,000 children of the 1 million children who are currently enrolled in the New York City school system have mild or unilateral hearing loss, and that more than 20,000 will struggle academically, socially, and behaviorally because of undetected and unaddressed hearing loss.⁷ School-based hearing screenings are a critical first step in identifying these students. The long-term implications of undiagnosed and unmanaged hearing loss for these children can have serious lifelong consequences. Providing hearing screening during the early language-learning years is critical for helping more children receive the benefits of early identification and intervention.⁸

The changes in Chancellor's Regulation A-701 also place an unreasonable burden on classroom teachers. It requires teachers to be able to identify those instances where hearing disorders are the cause of behavioral or academic difficulties, something which they are not trained to do. Setting up such inappropriate roles has proven ineffective in the past, represents a giant leap backward in disability policy, and serves to reverse the tremendous strides made in the last decade for early hearing detection and intervention services.

Thank you for your consideration of this request to introduce and pass legislation requiring the NYCDOE to reinstate routine hearing screenings. If you or your staff have any questions, please contact Susan Adams, ASHA's director of state legislative and regulatory affairs, at sadams@asha.org.

Sincerely,



Judy Rich, EdD, CCC-SLP, BCS-CL
2022 ASHA President

cc: Committee on Education
Mayor Eric Adams

¹ American Speech-Language-Hearing Association. (2022). *New York* [Quick Facts]. <https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/new-york-state-flyer.pdf>.

² Regulation of the Chancellor A-701. (2021). NYC Department of Education. <https://www.schools.nyc.gov/docs/default-source/default-document-library/a-701-school-health-services>.

³ U.S. Preventative Services Task Force. (2021). Hearing Loss in Older Adults: Screening. <https://www.uspreventiveservicestaskforce.org/uspstf/recommendation/hearing-loss-in-older-adults-screening>.

⁴ Katz., K. (1996). Canadian Task Force on the Periodic Health Examination. Annual checkup revisited. National Library of Medicine. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2146873/>.

⁵ Niskar, A. S., Kieszak, S. M., Holmes, A., Esteban, E., Rubin, C., Brody, D. J. (1998 Apr 8). Prevalence of hearing loss among children 6 to 19 years of age: the Third National Health and Nutrition Examination Survey. *JAMA*. <https://pubmed.ncbi.nlm.nih.gov/9546565/>.

⁶ Centers for Disease Control and Prevention. (2005). National Workshop on Mild and Unilateral Hearing Loss. <https://www.cdc.gov/ncbddd/hearingloss/conference.html>.

⁷ NYC Department of Education. (n.d.). DOE Data at a Glance. <https://www.schools.nyc.gov/about-us/reports/doe-data-at-a-glance>.

⁸ National Center for Hearing Assessment and Management. (2022). Early Childhood Hearing Screening. <https://infanthearing.org/earlychildhood/index.html>.